

E-File: December 11, 2009

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# UNITED STATES BANKRUPTCY COURT

## DISTRICT OF NEVADA

In re:

THE RHODES COMPANIES, LLC, aka  
 "Rhodes Homes," et al.,<sup>1</sup>  
 Debtors.

Case No.: BK-S-09-14814-LBR  
 (Jointly Administered)

Chapter 11

Affects:

☐ All Debtors  
☒ Affects the following Debtor(s)  
 Bravo, Inc.

Hearing Date: December 17, 2009  
 Hearing Time: 9:30 a.m.  
 Courtroom 1

<sup>1</sup> The Debtors in these cases, along with their case numbers are: Heritage Land Company, LLC (Case No. 09-14778); The Rhodes Companies, LLC (Case No. 09-14814); Tribes Holdings, LLC (Case No. 09-14817); Apache Framing, LLC (Case No. 09-14818); Geronimo Plumbing LLC (Case No. 09-14820); Gung-Ho Concrete LLC (Case No. 09-14822); Bravo, Inc. (Case No. 09-14825); Elkhorn Partners, A Nevada Limited Partnership (Case No. 09-14828); Six Feathers Holdings, LLC (Case No. 09-14833); Elkhorn Investments, Inc. (Case No. 09-14837); Jarupa, LLC (Case No. 09-14839); Rhodes Realty, Inc. (Case No. 09-14841); C & J Holdings, Inc. (Case No. 09-14843); Rhodes Ranch General Partnership (Case No. 09-14844); Rhodes Design and Development Corporation (Case No. 09-14846); Parcel 20, LLC (Case No. 09-14848); Tuscany Acquisitions IV, LLC (Case No. 09-14849); Tuscany Acquisitions III, LLC (Case No. 09-14850); Tuscany Acquisitions II, LLC (Case No. 09-14852); Tuscany Acquisitions, LLC (Case No. 09-14853); Rhodes Ranch Golf Country Club, LLC (Case No. 09-14854); Overflow, LP (Case No. 09-14856); Wallboard, LP (Case No. 09-14858); Jackknife, LP (Case No. 09-14860); Batcave, LP (Case No. 09-14861); Chalkline, LP (Case No. 09-14862); Glynda, LP (Case No. 09-14865); Tick, LP (Case No. 09-14866); Rhodes Arizona Properties, LLC (Case No. 09-14868); Rhodes Homes Arizona, L.L.C. (Case No. 09-14882); Tuscany Golf Country Club, LLC (Case No. 09-14884); and Pinnacle Grading, LLC (Case No. 09-14887).

**STIPULATION RE MOTION FOR RELIEF FROM STAY REFILED PURSUANT TO  
ORDER OF THE COURT AND UPDATED [DOCKET NUMBER 302]**

This stipulation (the "Stipulation") is made and entered into by Bravo, Inc. (the "Debtor"), one of the above-captioned debtors and debtors in possession (the "Debtors"), and Harsch Investment Properties – Nevada LLC (the "Movant"), through their respective counsel, and is made in reference to the following facts:

A. On July 2, 2009, Movant filed its *Motion for Relief from Stay Refiled Pursuant to Order of the Court and Updated* [Docket Number 302] (the "Motion").

B. On July 24, 2009, the Debtor filed its *Debtor's Opposition to Motion for Relief from Stay Filed by Harsch Investment Properties – Nevada LLC* [Docket Number 347].

D. On July 29, 2009, Movant filed its *Harsch Investment Properties, Nevada LL's Reply to Debtor's Opposition to the Motion to Lift Automatic Stay and in Support of Motion as Refiled* [Docket Number 371].

NOW, THEREFORE, IT IS HEREBY STIPULATED by the undersigned parties, through their counsel and respective representatives that:

1. Upon entry of an order approving this Stipulation, the Motion shall be deemed withdrawn without prejudice.

2. Movant retains all of its rights and remedies against the Debtor's insurer Lloyd's of London and the dismissal of the Motion shall not prejudice the Movant's rights to argue that it is entitled to a defense and indemnity of its claim against the Debtor's insurer, Lloyd's of London with respect to a state court lawsuit entitled *Rosen v. Bravo, Inc., et al.*, case no. 08-A-570558-C, whether in this Court or otherwise.

3. The Bankruptcy Court retains jurisdiction to resolve any dispute arising from the interpretation or enforcement of this Stipulation.

1 DATED this 11th day of December, 2009.

DATED this 11th day of December, 2009.

2 By: /s/ Janice J. Brown, Esq.

By: /s/ Zachariah Larson

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